

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re:)	Chapter 7
)	
JTR1, LLC, f/d/b/a JTR, LLC,)	Case No. 20-30141
)	
)	
Debtor.)	
<hr style="border: 0.5px solid black;"/>		
)	
A. Burton Shuford, Trustee of the)	
Bankruptcy Estate of JTR1, LLC,)	
f/d/b/a JTR, LLC,)	
)	
Plaintiff,)	
)	
v.)	Adv. Proc. No. 22-03018
)	
BJS Insurance, LLC, and)	
JJM, LLC,)	
)	
Defendants.)	
<hr style="border: 0.5px solid black;"/>		

**REPLY TO (A) TRUSTEE’S RESPONSE AND OBJECTION TO JOINDER TO
MOTIONS TO DISMISS AND (B) BRIEF IN OPPOSITION TO JOINDER TO
MOTIONS TO DISMISS**

Defendants BJS Insurance, LLC and JJM, LLC (together, the “Defendants”), by and through undersigned counsel, hereby submit this reply (the “Reply”) to the Response and Objection to Joinder to Motions to Dismiss (Dkt. No. 10) and the Brief in Opposition to Joinder to Motions to Dismiss (Dkt. No. 11) filed by Plaintiff A. Burton Shuford, Trustee for the chapter 7 bankruptcy estate of JTR1, LLC.

In support of this Reply, Defendants hereby join and incorporate by reference the Reply Brief to the Trustee’s Brief in Opposition to Motion to Dismiss Complaint (the “Kearns/Mullady Reply Brief”), filed by the defendants in the following adversary proceedings: *Shuford v. Kearns*, Adv. Pro. No. 22-03004, at Dkt. No. 14, and *Shuford v. Mullady*, Adv. Pro. No. 22-03008, at Dkt.

No. 14. For the reasons discussed in the Kearns/Mullady Reply Brief and Defendants' Joinder to Motions Dismiss (Dkt. No. 8), Defendants request that the Court dismiss with prejudice Counts I, II and III (and Count VI, with respect to Counts I, II and III) of the Complaint filed in the above-captioned adversary proceeding.

This is the 25th day of May, 2022.

K&L GATES, LLP

/s/ Margaret R. Westbrook

Margaret R. Westbrook

North Carolina State Bar No. 23327

John R. Gardner

North Carolina State Bar No. 32683

Emily K. Mather

North Carolina State Bar No. 47925

K&L Gates LLP

Post Office Box 17047 (27619-7047)

4350 Lassiter at North Hills Ave., Suite 300

Raleigh, North Carolina 27609

Telephone: (919) 743-7311

Facsimile: (919) 516-2011

E-mail: Margaret.Westbrook@klgates.com

John.Gardner@klgates.com

Emily.Mather@klgates.com

*Counsel for Defendants BJS Insurance, LLC
and JJM, LLC*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **REPLY TO (A) TRUSTEE'S RESPONSE AND OBJECTION TO JOINDER TO MOTIONS TO DISMISS AND (B) BRIEF IN OPPOSITION TO JOINDER TO MOTIONS TO DISMISS** was filed electronically in accordance with the local rules and was therefore served electronically on those entities that have properly registered for electronic service.

Dated: May 25, 2022

/s/ Margaret R. Westbrook

Margaret R. Westbrook